

BellSouth Telecommunications, Inc.  
Legal Department  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

Patrick W. Turner  
General Counsel-South Carolina

803 401 2900  
Fax 803 254 1731

patrick.turner@bellsouth.com

July 3, 2003

The Honorable Gary E. Walsh  
Executive Director  
Public Service Commission of SC  
Post Office Drawer 11649  
Columbia, South Carolina 29211

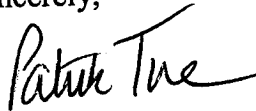
Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region  
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of  
1996  
Docket No. 2001-209-C

Dear Mr. Walsh:

Enclosed for filing are the original and fifteen copies of BellSouth  
Telecommunications, Inc.'s Motion for Clarification in the above-referenced matter.

By copy of this letter, I am serving this document on all parties of record.

Sincerely,



Patrick W. Turner

PWT/nml  
Enclosure  
cc: All Parties of Record  
PC Docs # 496918

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2001-209-C

IN RE:

BELLSOUTH )  
TELECOMMUNICATIONS, INC. - )  
APPLICATION TO PROVIDE IN-REGION )  
INTERLATA SERVICES PURSUANT TO )  
271 TELECOMMUNICATIONS ACT OF )  
1996 – SIX-MONTH REVIEW )

**BELLSOUTH TELECOMMUNICATIONS, INC'S  
MOTION FOR CLARIFICATION**

During its July 1, 2003 agenda session, the Public Service Commission of South Carolina ("the Commission") decided to hold a hearing in this docket on two issues: whether calculation of Incentive Payment Plan ("IPP") penalties should be based on the edge of the confidence interval; and whether IPP penalties related to change control process measures should be Tier 1 Penalties or Tier 2 Penalties. As the Commission is aware, pre-filed testimony already has been submitted in this docket. In order to avoid possible confusion and the potential need for further clarification of the Commission's decision, BellSouth Telecommunications, Inc. respectfully moves that the Commission's written order implementing this decision clarify that: (1) the testimony that already has been filed in this docket will form the basis for the hearing and that no other pre-filed testimony will be accepted; and (2) cross-examination will be permitted only on the two

issues that are the subject of the limited hearing.<sup>1</sup> This motion is made pursuant to S.C. Code Ann. §§ 58-9-1200 and 1-23-380 (1976), as well as S.C. Code Ann. Regs. 103-836, 103-842, 103-881, and other applicable rules and regulations.

Respectfully submitted, this 3rd day of July, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



---

Patrick Turner  
Room 5200  
1600 Williams Street  
Columbia, South Carolina 29201  
(803) 401-2900

R. Douglas Lackey  
J. Phillip Carver  
675 W. Peachtree Street, Suite 4300  
Atlanta, Georgia 30375  
(404) 335-0710

---

<sup>1</sup> BellSouth submits this motion based on its understanding of the Commission's decision. BellSouth reserves the right to seek further clarification and/or reconsideration of the Commission's written order implementing this decision.

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

)  
)  
)

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Motion for Clarification in Docket No. 2001-209-C to be served upon the following this July 3, 2003:

Elliott F. Elam, Jr., Esquire  
S. C. Department of Consumer Affairs  
3600 Forest Drive, 3<sup>rd</sup> Floor  
Post Office Box 5757  
Columbia, South Carolina 29250-5757  
(Consumer Advocate)  
**(U. S. Mail and Electronic Mail)**

Sonia Daniels  
Law & Government Affairs  
AT&T – Southern Region  
1200 Peachtree Street, NE, Rm. 4080  
Atlanta, Georgia 30309  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Jocelyn G. Boyd, Esquire  
Staff Attorney  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

Russell B. Shetterly, Esquire  
P. O. Box 8207  
Columbia, South Carolina 29202  
(Knology of Charleston and Knology of  
South Carolina, Inc.)  
**(U. S. Mail and Electronic Mail)**

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
1200 Main Street, 6th Floor  
Post Office Box 12399  
Columbia, South Carolina 29211  
(MCI WorldCom Network Service, Inc.  
MCI WorldCom Communications and  
MCImetro Access Transmission Services, Inc.)  
**(U. S. Mail and Electronic Mail)**

John F. Beach, Esquire  
John J. Pringle, Jr., Esquire  
Ellis Lawhorne & Sims, P.A.  
Post Office Box 2285  
Columbia, South Carolina 29202  
(Resort Hospitality Services, Inc., NuVox  
Communications, Inc., AIN and Momentum Business  
Solutions, Inc.)  
**(U. S. Mail and Electronic Mail)**

Marsha A. Ward, Esquire  
Michael Henry, Esquire  
MCI WorldCom, Inc.  
Law and Public Policy  
6 Concourse Parkway, Suite 3200  
Atlanta, Georgia 30328  
(MCI)  
**(U. S. Mail and Electronic Mail)**

Frank R. Ellerbe, Esquire  
Bonnie D. Shealy, Esquire  
Robinson, McFadden & Moore, P.C.  
1901 Main Street, Suite 1500  
Post Office Box 944  
Columbia, South Carolina 29202  
(NewSouth Communications Corp., SCCTA and SECCA  
and KMC Telecom III, Inc.)  
**(U. S. Mail and Electronic Mail)**

Genevieve Morelli  
Andrew M. Klein  
Kelley, Drye & Warren, LLP  
1200 19<sup>th</sup> Street, N.W.  
Washington, D.C. 20036  
(KMC Telecom III, Inc.)  
**(U. S. Mail and Electronic Mail)**

John D. McLaughlin, Jr.  
Director, State Government Affairs  
KMC Telecom, Inc.  
1755 North Brown Road  
Lawrenceville, GA 30043  
(KMC Telecom)  
**(U. S. Mail and Electronic Mail)**

Edward Phillips  
Attorney  
141111 Capital Blvd.  
Wake Forest, NC 27587-5900  
(Sprint/United Telephone)  
**(U. S. Mail and Electronic Mail)**

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, South Carolina 29205  
(Sprint/United Telephone)  
**(U. S. Mail and Electronic Mail)**

Marty Bocock, Esquire  
Director of Regulatory Affairs  
1122 Lady Street, Suite 1050  
Columbia, South Carolina 29201  
(Sprint/United Telephone Company)  
**(U. S. Mail and Electronic Mail)**

Faye A. Flowers, Esquire  
Parker Poe Adams & Bernstein LLP  
1201 Main Street, Suite 1450  
Columbia, South Carolina 29202  
(US LEC)  
**(U. S. Mail and Electronic Mail)**

William R. Atkinson, Esquire  
3100 Cumberland Circle  
Cumberland Center II  
Atlanta, Georgia 30339-5940  
(Sprint Communications Company L.P.)  
**(U. S. Mail and Electronic Mail)**

Andrew O. Isar  
Director – State Affairs  
7901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335  
(ASCENT)  
**(U. S. Mail and Electronic Mail)**

Nanette Edwards, Esquire  
ITC^DeltaCom Communications, Inc.  
4092 S. Memorial Parkway  
Huntsville, Alabama 25802  
**(U. S. Mail and Electronic Mail)**

Timothy Barber, Esquire  
Womble, Carlyle, Sandridge & Rice  
3300 One First Union Center  
301 South College  
Suite 3300  
Charlotte, North Carolina 20202  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

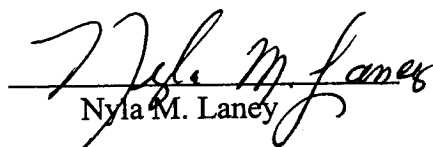
Traci Vanek, Esquire  
McKenna & Cuneo, LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Tami Azorsky, Esquire  
McKenna & Cuneo, LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Michael Hopkins, Esquire  
McKenna & Cuneo, LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

William Prescott, Esquire  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, Georgia 30309  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

John A. Doyle, Jr., Esquire  
Parker, Poe, Adams & Bernstein, L.L.P.  
150 Fayetteville Street Mall, Suite 1400  
Raleigh, North Carolina 27602  
(US LEC of South Carolina)  
**(U. S. Mail and Electronic Mail)**

  
Nyla M. Laney

PC Docs # 401224